

REMARKS

I. Overview

Claims 1-30 are pending in the present application. Claim 22 has been amended. The issues raised by the Examiner in the Non-Final Office Action of July 27, 2007 (*Office Action*) are as follows:

- Claim 22 stands objected to for informalities; and
- Claims 1-30 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,263,445 (*Blumenau*).

In response, Applicant respectfully traverses the outstanding objections and rejections, and requests reconsideration and withdrawal in light of the amendments and remarks presented herein.

II. Claim Objection

Claim 22 stands objected to for informalities. *Office Action* at p. 2. Applicant has amended claim 22 to correct its dependency so that, as amended, it depends upon claim 21. No new matter has been added, and this amendment is not intended to narrow the scope of the claim. Furthermore, Applicant believes that the Examiner's objection has now been overcome.

III. Claim Rejections Under 35 U.S.C. § 102(e)

Claims 1-30 stand rejected under 35 U.S.C. § 102(e) as being anticipated by *Blumenau*. Applicant traverses the rejection and asserts that these claims are allowable, at least, for the reasons stated below.

To anticipate a claim under 35 U.S.C. § 102, a single reference must teach each and every element of the claim. *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631 (Fed. Cir. 1987). In fact, "[t]he identical invention must be shown in as complete detail as is contained in the . . . claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236 (Fed. Cir. 1989).

Furthermore, for a reference to be anticipatory, “[its] elements must be arranged as required by the claim.” *In re Bond*, 910 F.2d 831 (Fed. Cir. 1990), *cited in* M.P.E.P. § 2131.

A. Independent Claims 1, 21, and 29

1. Blumenau does not disclose storing discovery information relating to a storage device

Independent claim 1 recites “storing discovery information *relating to a storage device*” (emphasis added). Independent claim 21 recites “means for storing discovery information *for a storage device*,” and independent claim 29 recites “at least one host system [that] stores information *relating to said at least one storage device* embedded in or coupled thereto” (emphasis added). Applicant respectfully asserts that *Blumenau* does not teach these elements because the information discovered in *Blumenau* is associated with its host devices, and not with its storage system.

From the outset, Applicant notes that *Blumenau* discloses a method for authenticating connections between multiple host processors and a shared storage system in order to protect the storage system from unprivileged accesses. *See Blumenau* at title and abstract. According to *Blumenau*, “[o]ne problem with coupling multiple hosts to a shared storage system is [that b]ecause multiple hosts have access to a common storage system, each host may physically be able to access information that may be proprietary to the other host processors.” *Id.* at col. 1, lns. 35-40. As such, *Blumenau*’s method provides for a verification, “at the storage system, that each request in a series of requests for access to the storage system indicated as having been issued by the device was actually issued by the device.” *Id.* at col. 1, lns. 54-57. Thus, while *Blumenau* may be concerned with discovering information related to devices that have access to a shared storage system, it is not concerned with the discovery information associated with the storage system itself.

In fact, Applicant points out that *Blumenau* makes a clear distinction between “devices” and “storage systems”:

[t]he present invention is directed to a data management method and apparatus for managing accesses by multiple *devices (e.g., host processors, file servers and the like)* to data at a *shared resource (e.g., a shared storage system)*.

Blumenau at col. 3, lns. 12-16 (emphasis added). Further, very passage of *Blumenau* cited by the Examiner states that “as each device enters the network, it queries the network to identify the other devices coupled to the network . . . [t]he source identifier may identify the *device (e.g., a host processor)* and the port of the device that is coupled to the network.” *Id.* at col. 4, ln. 62—col. 5, ln. 6 (emphasis added). At the most, this passage discloses discovering information about host processors, file servers, etc. that have access to a storage system, but it does not teach discovering information about the storage system itself.

Moreover, the paragraph immediately preceding the above passage of *Blumenau* states that “the data management aspect of the present invention configures volumes of data at the storage system 20 according to the *identity of the host devices* coupled to the storage system . . . [and that a]s a new host device enters the network, the system administrator allocates storage system volumes to the host.” *Id.* at col. 4, lns. 42-53. This passage further supports Applicant’s position that discovery information in *Blumenau* is associated with its host devices, and not with its storage system. At least for these reasons, *Blumenau* does not teach or suggest every element recited in the claims. Accordingly, Applicant respectfully requests that the Examiner withdraw the 35 U.S.C. § 102(e) rejection of record with respect to claims 1, 21, and 29.

2. Blumenau does not disclose querying a storage device for device identification information

Independent claim 1 recites “querying said storage device for device identification information.” Independent claim 21 recites “means for querying said storage device for device identification information,” and independent claim 29 recites “at least one host agent process [] operable to query said at least one storage device embedded in or coupled to said host system on which said host agent process resides for device identification information.” Applicant respectfully asserts that *Blumenau* does not teach these elements.

The passage of *Blumenau* relied upon by the Examiner as meeting these elements states that “as each device enters the network, it queries the network to identify the other devices coupled to the network . . . [t]he source identifier may *identify the device (e.g., a host processor)* and the port of the device that is coupled to the network.” *Blumenau* at col. 4, ln. 62—col. 5, ln. 6 (emphasis added). As previously noted, *Blumenau* makes a clear distinction between “devices,” which may be “host processors, file servers and the like,” and “shared storage systems.” *Id.* at col. 3, lns. 12-16. Therefore, while, *Blumenau* may disclose querying its host processors, file servers, etc. for identification information, it does not disclose querying a storage device for identification information, as recited in the claims. Accordingly, Applicant respectfully requests that the Examiner withdraw the 35 U.S.C. § 102(e) rejection of record with respect to claims 1, 21, and 29.

3. Blumenau does not disclose comparing at least a portion of returned device identification information to at least a portion of said stored discovery information

Independent claim 1 recites “comparing at least a portion of returned device identification information to at least a portion of said stored discovery information.” Independent claim 21 recites “means for comparing at least a portion of device identification information received in response to said query to at least a portion of said stored discovery information,” and independent claim 29 recites a “host agent process [] operable to . . . compare information returned by said at least one storage device to at least a portion of discovery information stored for said at least one storage device.” Applicant respectfully asserts that *Blumenau* does not teach these elements.

The passage of *Blumenau* relied upon by the Examiner as meeting these claimed elements states, in relevant part, that “[t]he address is compared with the entry in the transient filter table 84 which includes the LUN map associated [sic] with the HBA.” *Blumenau* at col. 8, lns. 10-21. However, *Blumenau*’s “HBA” is a host bus adapter of its host processor. *Id.* at col. 6, lns. 25-41; figure 3, items 12 and 45. Therefore, while *Blumenau* may disclose comparing a host processor’s identification information with information stored in a table, it does not teach

comparing returned storage device identification information with stored discovery information relating to the storage device, as recited in the claims. Accordingly, Applicant respectfully requests that the Examiner withdraw the 35 U.S.C. § 102(e) rejection of record with respect to claims 1, 21, and 29.

B. Dependent claims 2-20, 22-28, and 30

Dependent claims 2-20, 22-28, and 30 depend from claims 1, 21, and/or 29, each dependent claim thus inheriting all the limitations of its respective independent claim. As noted above, *Blumenau* does not teach every element of independent claims 1, 21, and/or 29. Consequently, *Blumenau* also fails to teach every element of dependent claims 2-20, 22-28, and 30. Accordingly, Applicant respectfully requests that the Examiner withdraw the 35 U.S.C. § 102(e) rejection of record with respect to claims 2-20, 22-28, and 30.

IV. Conclusion

In view of the above, Applicant believes that the pending application is in immediate condition for allowance. Applicant believes no fee is due with this response. However, if a fee is due, please charge Deposit Account No. 08-2025, under Order No. 10004559-1, from which the undersigned is authorized to draw.

Dated: October 26, 2007

I hereby certify that this paper (along with any paper referred to as being attached or enclosed) is being transmitted via the Office electronic filing system in accordance with § 1.6(a)(4).

Dated: October 26, 2007

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Respectfully submitted,

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